

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
SOUTHERN DIVISION**

DOUGLAS HANDSHOE

PLAINTIFF

VERSUS

CIVIL ACTION NO: 1:13CV254 HSO-RHW

JOHN DOE(S) AKA "RANDALL CAJUN"

DEFENDANTS

**MOTION FOR PROTECTIVE ORDER OF CHARLES LEARY
AND VAUGHAN PERRET**

COME NOW Defendants, Charles Leary and Vaughan Perret, and show that on or about July 16, 2013 Plaintiff, Douglas Handshoe, served counsel for these Defendants with Plaintiff's Interrogatories to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts. Pursuant to Federal Rule of Civil Procedure 26 and Local Uniform Civil Rule 26 discovery, at the earliest, cannot be commenced until after the Case Management Conference, which has not yet been set.

Accordingly, Defendants, Charles Leary, and Vaughan Perret, move for a protective order relieving them from responding to Plaintiff's Interrogatories to be Answered by Defendants Under Oath, Plaintiff's Request for Production of Documents to be Responded to by Defendant Under Oath, and Plaintiff's Request for Admission of Facts.

RESPECTFULLY SUBMITTED this the 25th day of July, 2013.

CHARLES LEARY and VAUGHAN
PERRET

By: s/ Henry Laird
Henry Laird, MS Bar No. 1774

CERTIFICATE OF SERVICE

I, Henry Laird, of the law firm of Jones Walker LLP do hereby certify that I have sent a true and correct copy of the foregoing Motion to Dismiss by using the ECF system to the following:

Douglas Handshoe
214 Corinth Drive
Bay St. Louis, Mississippi 39520
VIA UNITED STATES MAIL AND EMAIL: earning04@gmail.com

This the 25th day of July, 2013.

s/ Henry Laird

Henry Laird

Henry Laird (MSB No. 1774)
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